

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

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MARK SNOOKAL, an individual,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	2:23-cv-6302-HDV-AJR
CHEVRON USA, INC., a California	)	
Corporation, and DOES 1 through	)	
10, inclusive,	)	
	)	
Defendants.	)	
_____	)	

DEPOSITION OF

DR. VICTOR ADEYEYE

Volume 1, Pages 1 - 34

Taken Remotely Via Videoconference

Friday, November 15, 2024

Stenographically reported by:  
Renee M. Bencich, CSR No. 11946, RPR

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Job Number 117195

Dr. Victor Adeyeye

November 15, 2024

APPEARANCES

For Plaintiff, Mark Snookal:

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For Defendant Chevron USA, Inc.:

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Also Present:

Dolores Y. Leal, Attorney at Law  
Allred, Maroko & Goldberg

Paris Stephen, Attorney at Law  
Allred, Maroko & Goldberg

Eguono Erhun, Attorney at Law  
Chevron Nigeria Limited

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1 Q. Okay. What is your best estimate of how long  
2 you met with Sarah for each of those two or three times  
3 you met?

4 A. A lot of interruptions. Maybe one, two hours.  
5 A lot of interruptions in the course of discussing with  
6 her.

7 Q. Okay.

8 A. Job-related interruptions.

9 Q. Understood.

10 Did you review any documents to prepare for  
11 your deposition today?

12 A. I'm too busy. No. No, too busy. Yeah.

13 Q. Okay. Sorry. That's my coffee machine turning  
14 off in the background. I apologize for the noise.

15 Have you read the complaint in this case?

16 A. I'm not aware of --

17 Q. Like the actual lawsuit?

18 A. No, no, no, no. I'm not aware of that.

19 Q. Okay. Have you done anything to search for  
20 documents related to Mark Snookal, the plaintiff in this  
21 case?

22 A. No.

23 Q. Okay. Have you ever -- besides -- strike that.

24 Besides with your attorneys, have you spoken  
25 with anyone about Mark Snookal in writing?

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1 A. People with cardiovascular problem generally is  
2 the main core of my job, and that takes over 70 percent,  
3 looking at the record of the cardiovascular boarding and  
4 hospital visits. Thank you.

5 Q. Okay. When did you become a cardiologist?

6 A. Specialist, cardiology, 2010. Consultant  
7 cardiologist, 2015.

8 Q. Okay. So just to clarify, you completed your  
9 training to become a cardiologist in 2010?

10 A. 2015.

11 Q. 2015. Okay. What training did you undergo to  
12 become a cardiologist?

13 A. I underwent fellowship training of both  
14 National Postgraduate Medical College and West African  
15 College of Physician. Subspecialty, cardiologist.

16 Q. Okay. When did you graduate from medical  
17 school?

18 A. 2005.

19 Q. Do you have a board like -- strike that.  
20 Can you describe any board certifications that  
21 you hold currently?

22 A. Okay. Apart from the National Postgraduate  
23 Medical College, Nigeria, I also hold West African  
24 College of Physician.

25 I also have Committee on Trauma of American

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1 College of Surgeon, ATLS, Advanced Trauma Life Supports.

2 I also have American College of Physician,  
3 Advanced Cardiovascular Life Supports.

4 Also, Basic Life Supports for America.

5 Then, luckily, too, I have Health Management  
6 Certification of Nigerian Postgraduate Medical College,  
7 and a Physician of Emergency Medicine, Nigeria, where I  
8 also have a certification.

9 Thank you.

10 Q. Have you ever treated any patients with a  
11 thoracic aortic aneurysm?

12 A. In the course of my treating, I've had one case  
13 of such.

14 Q. Okay. When was that?

15 A. That was between 2010 to 2012.

16 Q. Okay. Do you know whether that patient had a  
17 descending aortic aneurysm or an ascending aortic  
18 aneurysm?

19 A. Aortic roots aneurysm. That was the patient's  
20 type.

21 Q. Okay. Is -- since I'm a layperson, is that --  
22 does that mean it's an ascending or --

23 A. Yes --

24 Q. -- descending?

25 A. -- yes, yes. Ascending. Ascending.

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1 Q. Okay.

2 A. Ascending.

3 Q. Thank you.

4 Have you ever treated anyone with a dissection  
5 who -- whose aortic aneurysm has dissected?

6 A. Same patient.

7 Q. Okay. Would it be fair to say, then, that  
8 you've never treated someone with a thoracic aneurysm  
9 that has ruptured?

10 A. That was the case. That was the case.

11 Q. Sorry, so the -- in the same case that you  
12 were --

13 A. Same patient.

14 Q. -- describing --

15 A. Same patient.

16 Q. -- it had ruptured?

17 A. Ruptured, yeah.

18 Q. Okay. So to clarify, had it ruptured or had it  
19 dissected?

20 THE COURT REPORTER: I'm sorry? One more time.

21 THE WITNESS: The distinction between  
22 dissecting and rupture is thin. So in an individual, it  
23 could coexist. In the same case I mentioned, it was  
24 actually an autopsy that --

25 THE COURT REPORTER: One more time, Doctor.

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1 One more time. I didn't understand one word.

2 THE WITNESS: Okay. The very case I mentioned,  
3 it was dissecting eventual rupture and patient passed  
4 away. The very case. In the last 10, 12 years. Thank  
5 you. Before Chevron.

6 BY MS. FLECHSIG:

7 Q. Okay. I know you've said that there was an  
8 autopsy conducted, so I --

9 A. Yes.

10 Q. -- want to clarify.

11 A. Yes.

12 Q. That was after you treated the patient, or were  
13 you conducting -- you were conducting the autopsy?

14 A. When we conducted the autopsy. It was a  
15 follow-up patient. Nothing could be done. Ruptured,  
16 and that was the --

17 THE COURT REPORTER: And -- I'm sorry. May we  
18 go off the record real quick?

19 MS. FLECHSIG: Yes.

20 THE COURT REPORTER: Thank you.

21 (Off the record.)

22 (The record was read as follows:

23 QUESTION: That was after you treated the  
24 patient, or were you conducting the autopsy?)

25 ANSWER: When we conducted the autopsy. It was



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1 a follow-up patient. Nothing could be done.

2 Ruptured, and that was the --)

3 THE COURT REPORTER: There was more.

4 THE WITNESS: Mortality. Death. Death.

5 THE COURT REPORTER: Thank you.

6 BY MS. FLECHSIG:

7 Q. So was the patient alive when they first came  
8 to you?

9 A. Yes.

10 Q. Understood.

11 Were you able to administer any treatments to  
12 the patient before they passed away?

13 A. The treatment could not be given. Not  
14 available.

15 Q. Understood.

16 Do you have a current curriculum vitae or a  
17 resume?

18 A. Have but not updated.

19 Q. Okay. Do you know when you would have last  
20 updated it?

21 A. Over a year ago.

22 Q. Have you published any medical research during  
23 the last 10 years?

24 A. Two contributions to textbooks of medicine with  
25 over 20 publications in local and international

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1 journals.

2 Q. Okay. Are those on cardiology or different  
3 subjects?

4 A. Part, cardiology. Others, all of them on  
5 medical conditions.

6 Q. Okay. I want to clarify also one thing about  
7 your training. I understand you have training in trauma  
8 surgery. I also understand you have training in  
9 cardiology.

10 Are you trained as a cardiac surgeon?

11 A. No, I'm not a surgeon.

12 Q. Okay. Understood.

13 Now I want to ask you some questions specific  
14 to the plaintiff in this lawsuit, Mark Snookal. I may  
15 refer to him also as Mr. Snookal.

16 When did you first hear the name Mark Snookal?

17 A. Sometimes twenty -- sometimes in 2019. I can't  
18 be very specific.

19 Q. Okay. How did you -- what was the context of  
20 hearing about him?

21 A. It was a -- an expert opinion review by --  
22 request by the occupational health physician of Chevron  
23 medical.

24 Q. Who was the occupational health physician of  
25 Chevron medical who asked you to offer an opinion on

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1 figure to that. Not only consultation, even medevac  
2 cases that require expats' management as a supporting  
3 facility to offshore -- location. Thank you.

4 THE COURT REPORTER: To offshore? Doctor, to  
5 offshore what location?

6 THE WITNESS: Offshore location. Offshore.  
7 Offshore. Escravos. Offshore Escravos. Escravos.  
8 Escravos. Escravos location. Offshore Escravos  
9 location.

10 Thank you.

11 BY MS. FLECHSIG:

12 Q. Okay. You have never spoken to Mark Snookal,  
13 the plaintiff in this case, correct?

14 A. Never spoken with him.

15 Q. Okay. Have you ever reviewed Mr. Snookal's  
16 employment history?

17 A. Employment history?

18 Q. Yes.

19 A. Or medical history?

20 Q. No, have you ever reviewed his employment  
21 history?

22 A. Oh, that's not within my scope.

23 Q. Okay. So, no, you have not reviewed his  
24 employment history, correct?

25 A. Yes.

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1 MS. FAN: Asked and answered.

2 BY MS. FLECHSIG:

3 Q. That's a -- you said yes?

4 A. I've never reviewed his employment history.

5 Q. Thank you.

6 You mentioned also giving treatment in response  
7 to medical evacuations.

8 A. Yes.

9 Q. Do you -- do you treat people who have been  
10 medevaced from Escravos, Nigeria?

11 A. Yes.

12 Q. How often do you treat people who have been  
13 medevaced on an emergency basis from Escravos, Nigeria?

14 A. Putting specific number is difficult because  
15 not all cases are medevaced. Many cases are, based  
16 on --

17 THE COURT REPORTER: Based --

18 THE WITNESS: Expats advised. Based on expat  
19 advised.

20 BY MS. FLECHSIG:

21 Q. Okay. Can you give me your best estimate of  
22 how often on average you treat someone who has been  
23 evacuated from Escravos on an emergency basis? Just  
24 approximately.

25 A. That varies. In a year -- it's -- it's quite

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\_\_\_\_\_)

REPORTER'S CERTIFICATION  
ORAL DEPOSITION OF  
DR. VICTOR ADEYEYE  
Volume 1, Pages 1 - 34  
Friday, November 15, 2024

I, RENÉE M. BENCICH, Certified Shorthand  
Reporter in and for the State of California, hereby  
certify to the following:

That the witness, DR. VICTOR ADEYEYE, was duly  
sworn by the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;

I further certify that pursuant to FRCP Rule  
30(e)(1) that the signature of the deponent:

(XX) was requested by the deponent or a party  
before the completion of the deposition and returned  
within 30 days from date of receipt of the transcript.  
If returned, the attached Changes and Signature Page  
contains any changes and the reasons therefor;

( ) was not requested by the deponent or a  
party before the completion of the deposition.

I further certify that I am neither attorney  
nor counsel for, related to, nor employed by any of the  
parties to the action in which this testimony was taken.

Further, I am not a relative or employee of any  
attorney of record in this cause, nor do I have a  
financial interest in the action.

Subscribed and sworn to on this the 1st day of  
December, 2024.

*Renée M. Bencich*

RENÉE M. BENCICH, CSR, RPR  
California License No. 11946